

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|------------------|---|-------------------------------|
| SHERRIE SHORTEN, |) | |
| |) | Case No. 4:15-cv-01988 |
| Plaintiff, |) | |
| |) | |
| v. |) | PLAINTIFF'S MOTION FOR |
| |) | DEFAULT JUDGMENT |
| OXFORD LAW, LLC, |) | |
| |) | |
| Defendant. |) | |

Now comes the Plaintiff, SHERRIE SHORTEN, by and through her attorneys, and respectfully requests this Honorable Court enter a default judgment against the Defendant, OXFORD LAW, LLC, for its failure to defend itself in this action after having been served with the Summons and Complaint. In support thereof, Plaintiff refers the Court to the attached Brief in Support of this Motion.

WHEREFORE, Plaintiff, SHERRIE SHORTEN, by and through his attorneys, prays for a judgment against Defendant, OXFORD LAW, LLC, as follows:

| | | |
|-------|-------------------------|-------------|
| a. | FDCPA Statutory Damages | \$ 1,000.00 |
| b. | Attorneys' Fees | \$ 2,657.50 |
| c. | Court Costs | \$ 400.00 |
| d. | Other Costs | \$ 55.00 |
| TOTAL | | \$ 4,112.50 |

Respectfully Submitted,

By: /s/ Lawrence D. Tackett
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that, on December 29, 2015, a copy of the foregoing Motion for Default Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Lawrence D. Tackett
Lawrence D. Tackett
Attorney for Plaintiff